

January 25, 2001

Mr. Carl Rolfsen  
Vista Packaging, Inc.  
7915 East 30<sup>th</sup> Street,  
Indianapolis, Indiana 46219

Re: 097-13677-00369  
First Minor Revision to  
MSOP 097-11648-00369

Dear Mr. Rolfsen:

Vista Packaging, Incorporated was issued a Minor Source Operating Permit (MSOP) on March 13, 2000 relating to the construction and operation of a screen coating operation. A letter filed by Cornerstone Environmental Health and Safety, Inc. on Vista Packaging's behalf requesting changes to this permit was received by ERMD on December 12, 2000. Pursuant to the provisions of 326 IAC 2-6.1-6(g), a minor permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The following changes to the MSOP appear as additions in boldface type and deletions in strikeout:

- 1) C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]
  - ~~(a)~~ — To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34)
  - ~~(a)(b)~~ Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, ~~ΘAM~~ **OAQ**, and ERMD on or before the date it is due.
  - ~~(b)(c)~~ Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
  - ~~(c)(d)~~ All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
    - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
    - (2) A malfunction as described in 326 IAC 1-6-2; or
    - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
    - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

Form Completed By: \_\_\_\_\_  
 Title/Position: \_\_\_\_\_  
 Date: \_\_\_\_\_

\_\_\_\_\_  
Phone: \_\_\_\_\_

~~Attach a signed certification to complete this report.~~

Pursuant to 326 IAC 2-6.1-6(h), this permit shall be revised by incorporating the minor permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Mr. Mark Caraher, ERMD at (317) 327-2234.

Sincerely,

Dan Dovenbarger, Administrator  
ERMD

Attachments

MBC

cc: U.S. EPA, Region V  
Mindy Hahn, IDEM OAQ  
files  
Matt Mosier, ERMD

**NEW SOURCE CONSTRUCTION PERMIT  
and MINOR SOURCE OPERATING PERMIT  
OFFICE OF AIR QUALITY  
AND  
INDIANAPOLIS ENVIRONMENTAL RESOURCES  
MANAGEMENT DIVISION**

**Vista Packaging Corporation  
7915 East 30<sup>th</sup> Street  
Indianapolis, Indiana 46219**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Minor Source Operation Permit No.:097-11648-00369	
Issued by: Robert F. Holm, Ph.D. ERMD Administrator	Issuance Date: March 13, 2000
First Minor Permit Revision.:097-13677-00369      Pages Affected: 12, 15	
Issued by:  Dan Dovenbarger ERMD Administrator	Issuance Date:

steps were taken and indicate who performed the tasks.

- (d) All record keeping requirements not already legally required shall be implemented when operation begins.

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C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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- (a) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and ERMD on or before the date it is due.
- (b) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
  - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) A malfunction as described in 326 IAC 1-6-2; or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
  - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

- (d) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

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C.16 Annual Notification [326 IAC 2-6.1-5(a)(5)]

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- (a) Annual notification shall be submitted to the Office of Air Quality and ERMD stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION  
and  
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION  
AIR QUALITY MANAGEMENT SECTION  
DATA COMPLIANCE**

**MINOR SOURCE OPERATING PERMIT  
SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: Vista Packaging Corporation  
Source Address: 7915 East 30th Street, Indpls., IN 46219  
Mailing Address: 7915 East 30th Street, Indpls., IN 46219  
CP No.: 097-11648-00369

Months:            to            Year:           

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

**9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD:**

**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD:**

<b>Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)</b>	<b>Number of Deviations _____</b>	<b>Date of each Deviation</b>

Form Completed By: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management  
Office of Air Quality  
and  
City of Indianapolis  
Indianapolis Environmental Resources Management Division**

**Technical Support Document (TSD) for a for a Minor Permit Revision to a  
Minor Source Operating Permit**

**Source Background and Description**

<b>Source Name:</b>	<b>Vista Packaging Corporation</b>
<b>Source Location:</b>	<b>7915 East 30<sup>th</sup> Street, Indianapolis, Indiana 46219</b>
<b>County:</b>	<b>Marion</b>
<b>SIC Code:</b>	<b>2670</b>
<b>Operation Permit No.:</b>	<b>MSOP 097-11648-00369</b>
<b>Operation Permit Issuance Date:</b>	<b>March 13, 2000</b>
<b>Permit Revision No.:</b>	<b>097-13677-00369</b>
<b>Permit Reviewer:</b>	<b>M. Caraher</b>

The City of Indianapolis Environmental Resources Management Division (ERMD) and the Office of Air Quality (OAQ) have reviewed a permit revision request from Vista Packaging relating to the operation of operation of a screen coating operation.

**History**

On December 12, 2000 Vista Packaging submitted a request to remove the Semi-Annual Compliance Monitoring Report Form from the Minor Source Operating Permit (MSOP) 097-11648-00369 issued March 13, 2000 by ERMD. There are no Compliance Monitoring provisions in Section D of MSOP 097-11648-00369 applicable to this source or Emission Unit. As a result, Vista Packaging requests that the requirement to semi-annually report be stricken from Section C.15 "General Reporting Requirements" [326 IAC 2-1.1-11] and the Semi-Annual Compliance Monitoring Report Form be deleted from MSOP 097-11648-00369.

**Existing Approvals**

The source was issued a Minor Source Operating Permit (MSOP) 097-11648-00369 on March 13, 2000 by ERMD. No additional modifications or revisions requests have been received by ERMD.

**Enforcement Issue**

There are no enforcement actions pending.

**Stack Summary**

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
001	Screen Coater	25	0.833	750 est.	Ambient
002	Screen Coater	25	0.833	750 est.	Ambient
003	Blanket Coater	25	1.333	750 est.	Ambient
004	General Building	20	NA	ND	Ambient

## Recommendation

The staff recommends to the Administrator that the Minor Permit Revision be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on December 12, 2000.

## Emission Calculations

Because this change does not affect Potential to Emit, actual emissions compliance with an emission limit, no emission calculations are needed to process this request.

## Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	0.0
PM-10	0.0
SO <sub>2</sub>	0.0
VOC	35.8
CO	0.0
NO <sub>x</sub>	0.0

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Vinyl Acetate	0.28
<b>Toluene</b>	<b>7.8</b>
<b>Di-2 Ethylhexyl Phthalate</b>	<b>3.4</b>
<b>Triethylamine</b>	<b>0.8</b>
<b>Methyl Alcohol</b>	<b>4.5</b>
<b>Dibutyl Phthalate</b>	<b>3.4</b>
<b>TOTAL</b>	<b>20.2</b>

- (a) Potential emissions (as defined in the Indiana Rule) of VOC are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-5.1-4, a minor source operating permit was issued March 13, 2000.
- (b) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

## Actual Emissions



No previous emission data has been received from the source.

### County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	unclassifiable
SO <sub>2</sub>	maintenance attainment
NO <sub>2</sub>	attainment
Ozone	maintenance attainment
CO	attainment
Lead	unclassifiable

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone.

### Federal Rule Applicability

- (a) The screen coating operation is not subject to the New Source Performance Standards for the Graphic Arts Industry: Publication Rotogravure Printing, 40 CFR Part 60.430, Subpart QQ (326 IAC 12), because it is not a publication Rotogravure printing operation.
- (b) There are no New Source Performance Standards (326 IAC 12) applicable to this facility.
- (c) The screen coating operation is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for the Printing and Publishing Industry, 40 CFR Part 63.820, Subpart KK (326 IAC 12), because it is not a major source for HAPs.
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

### State Rule Applicability - Entire Source

#### 326 IAC 2-1.1-11 (General Provisions: Compliance Requirements)

The source is required to have a permit because potential source wide VOC emissions exceed 10 tons per year. 326 IAC 2-1.1-11 (General Provisions: Compliance Requirements) allows the Administrator to require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. However, there are no applicable emission limits or compliance monitoring provisions applicable to this source because each emission unit (three screen presses) do not have an applicable NSPS or NESHAP, nor do they have a condition limiting PTE which would be the only condition keeping the unit out of an applicable requirement and actual emissions do not exceed 10 pounds per hour or 25 tons per year. Therefore, there should be no requirement for Compliance Monitoring or reporting of Compliance Monitoring.

#### 326 IAC 2-6 (Emission Reporting)

This facility is subject to IAPCB Regulation 2 (Permits) and 326 IAC 2-6 (Emission Reporting), because the source emits more than 10 tons/yr of VOC. Pursuant to this rule, the owner/operator of this facility must annually submit an emission statement of the facility. The annual statement must be received by April 15 of each year and must contain the minimum requirements as specified in 326 IAC 2-6-4.

#### 326 IAC IAC 2-6.1-6(g) (Minor Source Operating Permit Program: Permit Revisions)

Pursuant to 326 IAC 2-6.1-6(g) (Minor Source Operating Permit Program: Permit Revisions), the following modifications shall be processed as minor permit revisions:

Modifications that would reduce the frequency of any monitoring or reporting required by a permit condition or applicable requirement.

There is no underlying applicable emission limit or compliance monitoring requirement applicable to this source. As a result, Condition C.15 (a) is being deleted from MSOP 097-11648-00369 and the Semi-Annual Compliance Monitoring Report Form is also being deleted through the First Minor Permit Revision 13677-00369 pursuant to the minor revision procedures as outlined in 326 IAC 2-6.1-6(h).

#### 326 IAC 5 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

#### State Rule Applicability - Individual Facilities

##### 326 IAC 8-1-6 (General Provisions relating to VOC rules: general reduction requirements for new facilities)

The individual screen coating operations are not subject to the requirements of 326 IAC 8-1-6 due to the potential volatile organic compound emissions being less than twenty-five (25) tons per year each.

##### 326 IAC 8-5-5 (Miscellaneous operations: graphic arts operations)

The screen coating operation is not subject to the requirements of 326 IAC 8-5-5 (Miscellaneous operations: graphic arts operations) due to it not being a rotogravure or flexographic graphic arts facility.

##### 326 IAC 2-4.1(HAPs Major Sources: New Source Toxics Control)

The screen coating operation is not subject to the requirements of 326 IAC 2-4.1 due to this source not being a major source of hazardous air pollutants.

#### Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

There are no compliance monitoring requirements applicable to this source because the source was issued a Minor Source Operating Permit and:

- (a) The source is not a major source and is not regulated under 326 IAC 2-7 (Part 70 Permit Program).
- (b) Source wide potential to emit VOC is approximately, 35 tons per year. Potential to Emit from any individual screen coater does not exceed 25 tons per year, therefore, actual emissions do not exceed 10 pounds per hour or 25 tons per year.
- (c) There are no applicable emission limits or compliance monitoring provisions applicable to this source because each emission unit (three screen presses) does not have an applicable NSPS or NESHAP, nor do they have a condition limiting PTE which would be the only condition keeping the unit out of an applicable requirement.

### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.

### **Conclusion**

The operation of this Minor Permit Revision 097-13677-00369 to MSOP 097-11648-00369 shall be subject to the conditions of the attached proposed revision to MSOP 097-11648-00369.